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August 6, 2024

**VIA ECF**

Hon. Arun Subramanian  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Belya v. Hilarion, et al.***  
Case No.: 20-cv-6597-SDNY (AS)

Dear Judge Subramanian:

I am counsel for the Plaintiff, Alexander Belya, in this case. I write to request an extension of time to respond to Defendants' three motions that were filed yesterday.

Defendants have filed a motion for summary judgment and two *Daubert* motions. The summary judgment motion is supported by a memorandum of law, a 282-paragraph Rule 56.1 statement, and twelve separate declarations, with numerous exhibits attached. In terms of sheer paper, this is a massive production.

The amount of work presented by the three motions, taken together, is vast. I am the only lawyer working on this matter for the Plaintiff.

I respectfully request an extension until September 27, 2024, to file Plaintiff's opposition to all three motions. This case has been vigorously litigated since 2020, which includes an appeal to the Second Circuit, including an *en banc* hearing, and a petition for certiorari to the Supreme Court. I respectfully submit that Plaintiff should be given adequate opportunity to address Defendants' arguments. The amount of time requested is needed for that. Defendants have been teeing the summary judgment motion for months. Even if I were to drop everything else I have on my plate, it would take me several weeks to wade through the verbiage of the motions.

Hon. Arun Subramanian, U.S.D.J.  
August 6, 2024

I thank the Court for its consideration.

Respectfully,

/s/ Oleg Rivkin  
Oleg Rivkin

cc: Counsel of record